

April 22, 2002

Ms. Emily Clark
Product Specialist
Velsicol Chemical Corporation
10400 West Higgins Road
Suite 600
Rosemont, Illinois 6008

Dear Ms. Clark:

The Office of Pollution and Toxics is transmitting EPA's comments on the robust summaries and test plan for diethylene glycol dibenzoate, posted on the ChemRTK HPV Challenge Program Web site on December 3, 2001. I commend Velsicol Chemical Corporation for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the attached Comments on the HPV Challenge Web site within the next few days. As noted in the comments, we ask that Velsicol Chemical Corporation advise the Agency, within 60 days of this posting on the Web site, of any modifications to its submission.

If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

/s/

Oscar Hernandez, Director
Risk Assessment Division

Attachment

cc: W. Sanders
A. Abramson
C. Auer
M. E. Weber

**EPA Comments on Chemical RTK HPV Challenge Submission:
Diethylene Glycol Dibenzoate**

SUMMARY OF EPA COMMENTS

The sponsor, Velsicol Chemical Corporation, submitted a Test Plan and Robust Summaries to EPA dated October 2001, for diethylene glycol dibenzoate (CAS No. 120-55-8). EPA posted the submission on the

ChemRTK website on December 3, 2001.

EPA has reviewed this submission and reached the following conclusions:

1. Physicochemical and Environmental Fate Data. The submitter needs to provide measured photodegradation and stability in water data.
2. Health Endpoints. All appropriate SIDS-level tests have been performed.
3. Ecotoxicity. All appropriate SIDS-level tests have been performed and are adequate.

EPA requests that the Submitter advise the Agency within 60 days of any modifications to its submission.

EPA COMMENTS ON THE DIETHYLENE GLYCOL DIBENZOATE CHALLENGE SUBMISSION

Test Plan

Chemistry (melting point, boiling point, vapor pressure, water solubility, and partition coefficient).

Adequate existing data are available for these endpoints.

Environmental Fate (photodegradation, stability in water, biodegradation, fugacity).

The reported biodegradation data are adequate for the purpose of the HPV Challenge Program. The submitter needs to clarify if the input parameters in the submitted transport and distribution (fugacity) model are calculated or measured. EPA prefers that the submitter provide measured data for photodegradation and stability in water.

Health Effects (acute toxicity, repeat dose toxicity, genetic toxicity, and reproductive/developmental toxicity).

Adequate existing data are available for these endpoints.

Ecotoxicity (fish, invertebrates, algae).

Adequate existing data are available for these endpoints.

SPECIFIC COMMENTS ON ROBUST SUMMARIES

Environmental Fate (photodegradation, stability in water, biodegradation, fugacity)

The submitter needs to clarify if the physical and chemical property data are calculated or measured, and identify if the input parameters in the fugacity model are calculated or measured. EPA prefers using measured input values to calculate transport and distribution.

Followup Activity

EPA requests that the Submitter advise the Agency within 60 days of any modification to its submission.